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Co-Lead/Liaison Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

**IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION**

No. MD-15-02641-PHX-DGC

**PLAINTIFFS' UNOPPOSED
MOTION TO FILE DOCUMENT
UNDER SEAL IN SUPPORT OF
DISCOVERY BRIEFING**

Plaintiffs move this Court for an Order pursuant to the Stipulated Protective Order (Doc. 268), Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6, sealing certain documents accompanying Plaintiffs' Brief on Foreign Regulatory Materials ("Brief"). The exhibits that are the subject of this Motion for Leave to File under Seal are alleged by Bard to constitute trade secrets or other confidential research, development, or commercial information and have been designated by Bard as such pursuant to the Stipulated Protective Order, thereby warranting protection from public disclosure for discovery related motion.

1 Plaintiffs seek leave to file these documents under seal based on Bard's designation of
2 them as confidential pursuant to the Stipulated Protective Order; Plaintiffs explicitly reserve
3 their rights to challenge the confidentiality designations of the documents at a later time,
4 pursuant to the terms in the Stipulated Protective Order. Based on Bard's designation of the
5 documents as confidential, Plaintiffs may only submit them to this Court under seal. Bard
6 does not oppose this Motion.

7 The documents that are the subject of this Motion are described in Exhibit A.

8 For the foregoing reasons, and in order that Plaintiffs can fully brief the issues in the
9 Brief while complying with the terms of various protective orders, the Court should grant
10 Plaintiffs' leave to file these documents under seal.

11 RESPECTFULLY SUBMITTED this 25th day of August 2016.

12 GALLAGHER & KENNEDY, P.A.

13 By: s/ Robert W. Boatman

14 Robert W. Boatman
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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of August, 2016, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

s/ Gay Blakesley

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